Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.
Pursuant to The Honorable Judge Victor Marrero of the
United States District Court, Southern District of New York

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VIA ECF

Hon. Debra C. Freeman United States Courthouse Southern District of New York 500 Pearl Street, Suite 1040 New York, New York 10007

March 3, 2022

Re: Interim Status Report of the Temporary Court-Appointed Receiver of Link Motion Inc. in the matter of *Baliga v. Link Motion Inc. et al.*, 1:18-cv-11642 (S.D.N.Y.) (VM) (DCF)

Dear Magistrate Judge Freeman:

Pursuant to Judge Marrero's February 1, 2019 Order (ECF 26) ("Order"), I write to submit an additional status report in connection with the Receivership's continued efforts.

As I indicated in my February 3, 2022 status report (ECF 268), on February 7, 2022, the Receiver, by its Cayman Islands counsel, KSG Attorneys at Law, filed an application in the Grand Court of Cayman Islands, Financial Services Division (the "Cayman Grand Court"), requesting approval to call an Extraordinary General Meeting ("EGM") in accordance with Link Motion Inc.'s (the "Company's) bylaws, Cayman law, and the Receiver's powers, authority, and duty. On February 23, 2022, the Cayman Grand Court approved the Receiver's application. A copy of the Grand Court's Order is attached as Exhibit A. The Receiver plans to send notice of the EGM in accordance with the Company's bylaws.

Please do not hesitate to contact me via email or telephone if your honor wishes to discuss this request in more detail.

Respectfully submitted,

Robert W. Seiden, Esq.

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Link Motion Inc.